

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**ANYWHERECOMMERCE, INC.
and BBPOS LIMITED,
Plaintiffs,**

v.

**INGENICO INC., INGENICO CORP.
and INGENICO GROUP, SA,
Defendants.**

**CIVIL ACTION NO.
1:19-cv-11457-IT**

DEFENDANTS' EXHIBIT LIST¹

1	2	3	4	5	6	7	8
Exhibit Number for Identification	Briefly Describe	Party Offering Exhibit	Does party expect to offer exhibit or may offer if need arises?	Does opposing side object (state rule), reserve, or have no objection?			
1000	BBPOS's Third Amended Objections and Answers to Defendants' First Set of Interrogatories to AnywhereCommerce and BBPOS	Def.	Offer				
1001	AnywhereCommerce's Amended Objections and Answers to Defendants' First Set of Interrogatories to AnywhereCommerce and BBPOS	Def.	May Offer				

¹ Defendants reserve the right to supplement this list prior to and throughout trial in this matter to the extent permitted by law and the governing rules of civil procedure.

1002	Expert Report of Dr. Jennifer Vanderhart	Def.	Offer				
1003	Rebuttal Expert Report of Dr. Michael Shamos	Def.	Offer				
1004	Expert Report of Stephen Scherf	Def.	Offer				
1005	Rebuttal Expert Report of Stephen Scherf	Def.	Offer				
1006	Expert Report of Ivan Zatkovich	Def.	Offer				
1007	Rebuttal Expert Report of Ivan Zatkovich	Def.	Offer				
1008	Graylin v. Ingenico Compliant	Def.	Offer				
1009	RP350x (physical device)	Def.	Offer				
1010	RP150x (physical device)	Def.	Offer				
1011	RP457c (physical device)	Def.	Offer				
1012	RP457c-BT (physical device)	Def.	Offer				
1013	Moby/3000 (physical device)	Def.	Offer				
1014	Moby/6500 (physical device)	Def.	Offer				
1015	Moby/5500 (physical device)	Def.	Offer				
1016	Moby/8500 (physical device)	Def.	Offer				
1017	iCMP (physical device)	Def.	May Offer				
1018	G5x/G4x-Half Moon (physical device)	Def.	Offer				

1019	G5x-Paypal (physical device)	Def.	Offer				
1020	iWL220 (physical device)	Def.	May Offer				
1021	MagTek (physical device)	Def.	May Offer				
1022	IDTech (physical device)	Def.	May Offer				
1023	Square (physical device)	Def.	May Offer				
1024	HomeATM and BBPOS License and Non-Competition Agreement (AC_0000917-22)	Def.	May Offer				
1025	AnywhereCommerce and BBPOS Amended License and Non-Competition Agreement (AC_0246850-55)	Def.	May Offer				
1026	43611423 Canada, Inc. and BBPOS License Agreement	Def.	May Offer				
1027	ROAM and BBPOS Engineering, Development and Non- Competition License Agreement (AC_0270544-54)	Def.	Offer				
1028	Amendment to ROAM and BBPOS Engineering, Development and License Agreement (IngenicoInc_0268324- 38)	Def.	Offer				
1029	ROAM and Landi Supply Agreement (IngenicoInc_0167554- 88)	Def.	Offer				

1030	RP350x Development Agreement (IngenicoInc_0284132-96)	Def.	Offer				
1031	RP 150x and RP 100x/ PP10x Development Agreement (IngenicoInc_0284539-57)	Def.	Offer				
1032	First Amendment to the 750x Development Agreement (IngenicoInc_0229510-15)	Def.	Offer				
1033	Landi ITMP & ITMP + (RP350x and RP750x) PROJECT Workshop (IngenicoInc_0190282-304)	Def.	May Offer				
1034	Landi Card Reader promotional material	Def.	Offer				
1035	ROAM RP350x Mobile Card Reader product review (BBPOS_1585952)	Def.	Offer				
1036	ROAM's press release re RP350x	Def.	Offer				
1037	ROAM Key Management System Product Requirements Document IngenicoInc_0079955-97)	Def.	May Offer				
1038	Summary of Terms of Acquisition of BBPOS (IngenicoInc_0008817-20)	Def.	May Offer				

1039	Unsigned letter from BBPOS to ROAM re Termination of Summary of Terms of Acquisition of BBPOS (BBPOS_1582647)	Def.	May Offer				
1040	History of Invention and Chronology of Events re BBPOS IP and Rights	Def.	May Offer				
1041	PCI Security Standards Council- Data Security and Credit Card Security Standards	Def.	Offer				
1042	April 2012 Ingenico ITMP (IngenicoInc_0068186)	Def.	Offer				
1043	July 2012 Ingenico ITMP (IngenicoInc_0283870)	Def.	Offer				
1044	Sept. 2012 Ingenico ITMP (IngenicoInc_0286168)	Def.	Offer				
1045	Oct. 2012 Ingenico ITMP (IngenicoInc_0283870)	Def.	Offer				
1046	Communication API Programming Guide for Android (IngenicoInc_0286187-221)	Ded.	May Offer				
1047	2015 Compatible Phone List (IngenicoInc_0303815)	Def.	May Offer				
1048	Technical Drawings BBPOS_0005601-06)	Def.	Offer				
1049	Technical Drawings (BBPOS_1687849)	Def.	Offer				

1050	Coding (BBPOS_0691264-72)	Def.	Offer				
1051	Executive Summary (FISV-AC-0000226)	Def.	May Offer				
1052	Landi IMPT Audio Jack Compatibility Test Solution IngenicoInc_0283897- 904)	Def.	May Offer				
1053	Audio Jack Manager Library Guidelines (IngenicoInc_0305441- 44)	Def.	Offer				
1054	Y03-3 Communications Test Instructions (IngenicoInc_0306560)	Def.	Offer				
1055	Collector Manual (IngenicoInc_0306536- 41)	Def.	Offer				
1056	Test Output Feedback by Landi IngenicoInc_0306555- 57)	Def.	Offer				
1057	Audio jack Scheme of RP350 (IngenicoInc_0295696- 97)	Def.	May Offer				
1058	AnywhereCommerce BOD Meeting	Def.	May Offer				
1059	AnywhereCommerce, Consolidated Monthly Financial Reporting Package: BBPOS Group, 12/31/2017 (AC_0982903)	Def.	May Offer				
1060	AnywhereCommerce, Customer Sales Detail Report 07-01-2013 to 09-17-2020, c. 9/2020 (AC_1264260)	Def.	May Offer				

1061	AnywhereCommerce, Financial Model, c. 2014 (AC_0658933)	Def.	May Offer				
1062	AnywhereCommerce, Sales, Undated (AC_1260959)	Def.	May Offer				
1063	BBPOS Consolidated Monthly Financial Reporting Package, 1/31/2018 (BBPOS_1608318)	Def.	May Offer				
1064	BBPOS Consolidated Monthly Financial Reporting Package, 10/31/2016 (BBPOS_1596565)	Def.	May Offer				
1065	BBPOS Consolidated Monthly Financial Reporting Package, 11/30/2018 (BBPOS_1614816)	Def.	May Offer				
1066	BBPOS Consolidated Monthly Financial Reporting Package, 11/31/2016 (BBPOS_1597308)	Def.	May Offer				
1067	BBPOS Consolidated Monthly Financial Reporting Package, 12/31/2016 (BBPOS_1597589)	Def.	May Offer				
1068	BBPOS Consolidated Monthly Financial Reporting Package, 12/31/2018 (BBPOS_1687809)	Def.	May Offer				
1069	BBPOS Consolidated Monthly Financial Reporting Package, 12/31/2019 (BBPOS_1687811)	Def.	May Offer				

1070	BBPOS Consolidated Monthly Financial Reporting Package, 12/31/2020 (BBPOS_1687810)	Def.	May Offer				
1071	BBPOS Consolidated Monthly Financial Reporting Package, 4/30/2018 (BBPOS_1610576)	Def.	May Offer				
1072	BBPOS Consolidated Monthly Financial Reporting Package, 5/31/2017 (BBPOS_1602522)	Def.	May Offer				
1073	BBPOS Consolidated Monthly Financial Reporting Package, 8/31/2018 (BBPOS_1612618)	Def.	May Offer				
1074	BBPOS Consolidated Monthly Financial Reporting Pack, 12/31/2015 (BBPOS_1589783)	Def.	May Offer				
1075	BBPOS Consolidated Monthly Financial Reporting Package, 12/31/2016 (BBPOS_1597589)	Def.	May Offer				
1076	BBPOS Consolidated Monthly Financial Reporting Package, 12/31/2017 (BBPOS_1612262)	Def.	May Offer				
1077	BBPOS Consolidated Monthly Financial Reporting Package, 12/31/2018 (BBPOS_1614816)	Def.	May Offer				

1078	BBPOS Consolidated Monthly Financial Reporting Package, 12/31/2018 (BBPOS_1687809)	Def.	May Offer				
1079	BBPOS Consolidated Monthly Financial Reporting Package, 12/31/2019 (BBPOS_1687811)	Def.	May Offer				
1080	BBPOS Consolidated Monthly Financial Reporting Package, 12/31/2020 (BBPOS_1687810)	Def.	May Offer				
1081	BBPOS, 'P&L Forecast,' c.2016 (BBPOS_1618561)	Def.	May Offer				
1082	Ingenico, "Litigation Fees and Expenses," (IngenicoInc_0306564-65)	Def.	May Offer				
1083	ROAM Custom Sales Orders by Customer Summary (IngenicoInc_0142530)	Def.	May Offer				
1084	Anson, Weston (2005), Fundamentals of Intellectual Property Valuation: A Primer for Identifying and Determining Value, Chicago, IL: American Bar Association.	Def.	May Offer				
1085	AnywhereCommerce Press Release, "AnywhereCommerce Granted Patents on Mobile Card Acceptance 'Dongle,'" 10/25/2012, https://www.anywherecommerce.com/anywherecommerce-granted-	Def.	May Offer				

	patents-on-mobile-card-acceptance-dongle/						
1086	AnywhereCommerce Website, Accessories, https://www.anywherecommerce.com/accessories/	Def.	May Offer				
1087	AnywhereCommerce Website, Card Readers – Device Comparison, https://www.anywherecommerce.com/device-comparison/	Def.	May Offer				
1088	AnywhereCommerce Website, Company, https://www.anywherecommerce.com/company/	Def.	May Offer				
1089	AnywhereCommerce Website, Company, https://www.anywherecommerce.com/company/	Def.	May Offer				
1090	AnywhereCommerce Website, Custom Solutions, https://www.anywherecommerce.com/custom-solutions/	Def.	May Offer.				
1091	AnywhereCommerce Website, Mobile Apps, https://www.anywherecommerce.com/mobile-apps/	Def.	May Offer				
1092	BBPOS Website, Chipper 2X BT Product Sheet, at 2, available at: https://www.bbpos.com/wp-content/uploads/2017/09/C2XBT_leaflet.pdf	Def.	May Offer				

1093	BBPOS Website, Home, https://www.bbpos.com/	Def.	May Offer				
1094	BBPOS Website, Overview, https://www.bbpos.com/overview/#	Def.	May Offer				
1095	BBPOS, Corporate Brochure, available at: https://www.bbpos.com/wp-content/uploads/2018/03/Corporate-Brochure.pdf	Def.	May Offer				
1096	Bloomberg Website, Roam Data Inc, https://www.bloomberg.com/profile/company/0203653D:US	Def.	May Offer				
1097	Business.com , “How to Choose a Mobile POS System,” 1/6/2022, https://www.business.com/articles/mobile-pos/	Def.	May Offer				
1098	CBInsights Website, BBPOS, https://www.cbinsights.com/company/bbpos	Def.	May Offer				
1099	Creditcards.com , “What Is an EMV Credit Card, and How Does It Work?,” 12/17/2021, available at: https://www.creditcards.com/education/emv-faq-chip-cards-answers-1264/	Def.	May Offer				
1100	Digital Transactions, “Seeking an ‘Integrated Mobile Offer,’ Ingenico Completes Takeover of Roam Data,” 1/20/2015,	Def.	May Offer				

	https://www.digitaltransactions.net/seeking-an-integrated-mobile-offer-ingenico-completes-takeover-of-roam-data						
1101	Fintech Futures, "Worldline Completes \$8.6bn Acquisition of Ingenico," 11/4/2020, https://www.fintechfutures.com/2020/11/worldline-completes-8-6bn-acquisition-of-ingenico/	Def.	May Offer				
1102	Ingenico Press Release, "Ingenico Group now owns 100% of Mobile Payments Leader ROAM," 1/20/2015, https://www.ingenico.com/press-and-publications/press-releases/all/2015/01/20150120-ingenico-group-owns-100-roam.html	Def.	May Offer				
1103	Ingenico Press Release, "Third Quarter 2020," 10/29/2020, https://cdn.ingenico.com/binaries/content/assets/corporate-en/press-releases/2020/10/pr_q3_2020_291020.pdf	Def.	May Offer				
1104	Ingenico Website, About Us, https://www.ingenico.com/about-ingenico/about-us/about-us	Def.	May Offer				
1105	Ingenico Website, Mobile Point of Sale Solutions – mPOS EMV SDK,	Def.	May Offer				

	https://www.ingenico.us/mobile-solutions/mpos-emv-sdk/						
1105	Ingenico Website, Mobile Point of Sale Solutions, https://www.ingenico.us/mobile-solutions/	Def.	May Offer				
1106	Ingenico Website, Mobile Point of Sale Solutions: mPOS EMV SDK, https://www.ingenico.us/mobile-solutions#mpos-emv-sdk	Def.	May Offer				
1107	Ingenico Website, Moby/8500 Next Gen Chip & Pin Mobile Card Reader, https://www.ingenico.us/mobile-solutions/mpos-card-readers/moby-8500.html	Def.	May Offer				
1108	Ingenico Website, mPOS Card Readers, https://www.ingenico.us/mobile-solutions/mpos-card-readers/	Def.	May Offer				
1109	Ingenico Website, RP457c Series, https://www.ingenico.us/mobile-solutions/mpos-card-readers/rp457c-series.html	Def.	May Offer				
1110	Ingenico Website, Welcome to ROAM, https://mobile-	Def.	May Offer				

	solutions.ingenico.com/ us/						
1111	Ingenico, “2019 Universal Registration Document,” c. 2019, at PDF 6, available at: https://cdn.ingenico.com/binaries/content/assets/corporate-en/finance/registration-documents/ingenico_en-urd-2019.pdf	Def.	May Offer				
1112	OpenGovCA Website, AnywhereCommerce Inc., https://opengovca.com/corporation/7918453	Def.	May Offer				
1113	PYMNTS.com, “mPOS Tracker: July 2019,” 7/2019, at 55, available at: https://www.pymnts.com/wp-content/uploads/2019/07/mPOS-Tracker-July-2019.pdf .	Def.	May Offer				
1114	PYMNTS.com, “mPOS Tracker: September 2016,” 9/2016, at 3, available at: http://whatsnextdata.com/wp-content/uploads/2016/09/mPOS-Tracker-September-2016-1.pdf	Def.	May Offer				
1115	Statista, Mobile POS Payments Transaction Value, 3/2022, https://www.statista.com/outlook/dmo/fintech/digital-payments/mobile-pos-payments/worldwide	Def.	May Offer				

1116	U.S. Chamber of Commerce, "Need a Mobile Point-of-Sale System? Here's What You Need to Know," 2/25/2020, https://www.uschamber.com/co/run/technology/mobile-pos-system-guide	Def.	May Offer				
1117	BBPOS Sales & Market Opportunities, 06/2018 (BBPOS_1610500)	Def.	May Offer				
1118	Spreadsheet - Sales Data from ROAM 2016-2017	Def.	May Offer				
1119	Spreadsheet -2018 Data SAP	Def.	May Offer				
1120	Spreadsheet -Summary of Mobile Terminals sold by Ingenico U.S. 2019-2020	Def.	May Offer				
1121	Spreadsheet- Pivot Table of Mobile Sales by Customers by Ingenico (No Bates Number)	Def.	May Offer				
1122	Spreadsheet- Data Dump from SAP (IngenicoInc_0126787)	Def.	May Offer				
1123	Spreadsheet – EUS 2001, Financial Analysis, 2013-2018 (IngenicoInc_0269935)	Def.	May Offer				
1124	Japanese Patent - Wireless Data Transfer Equipment (Inui Yasuo)	Def.	May Offer				

1125	US Patent - Audio Activity Detection Circuit to Increase Battery Life in Portable Computers (Don. T. Lam)	Def.	May Offer				
1126	US Patent - Smart Bluetooth Interface Gateway to Mate a Non-Bluetooth Wireless Device with a Bluetooth Headset (Philip D. Mooney)	Def.	May Offer				
1127	US Patent - Circuit for Detecting a Current Passing Through a Consumer (Christoph Wenger)	Def.	May Offer				
1128	US Patent - Identification System and Method for Recognizing Any One of a Number of Different Types of Devices (Stuart Patterson)	Def.	May Offer				
1129	US Patent - Integrated Circuit w Automatic Polarity Detection and Configuration (Heling Yi)	Def.	May Offer				
1130	US Patent - Mobile Phone Extension and Data Interface via an Audio Headset Connection (Thomas Cehelnik)	Def.	May Offer				
1131	US Patent - Portable Electronic Devices with Power Management Capabilities (Hugo Fiennes)	Def.	May Offer				

1132	US Patent - Mobile Commerce Execution Method and Apparatus (Hyeon-Seok Son)	Def.	May Offer				
1133	US Patent - System, Method, and Apparatus for Communicating Information from a Personal Electronic Device (Nagesh Challa)	Def.	May Offer				
1134	US Patent - System and Apparatus for Communicating Digital Data through Audio Input/Output Ports (Paul P. Griffin)	Def.	May Offer				
1135	US Patent - Providing Power to an Accessory During Portable Computing Device Hibernation (Robert Walsh)	Def.	May Offer				
1136	US Patent - Remote Negotiable Instrument Processor (Sean Pennock)	Def.	May Offer				
1137	US Patent - Remote Invoice and Negotiable Instrument Processing (Sean Pennock)	Def.	May Offer				
1138	US Patent - Audio Port Communication and Power Device (Guo Qiang Mu)	Def.	May Offer				
1139	US Patent - Audio Port Communication and Power Device (Guo Qiang Mu)	Def.	May Offer				
1140	US Patent - Integrated Mobile Phone and Medical Implant Monitoring System and	Def.	May Offer				

	Method for Using the Same (Ahmet Tekin)						
1141	US Patent - System and Method for Microphone Polarity Detection (Jens Kristian Poulsen)	Def.	May Offer				
1142	US Patent - Power Management Circuitry in Peripheral Accessories of Audio Devices (Wing Cheong Chan)	Def.	May Offer				
1143	WO Patent-2011/047042 (Dorsey)	Def.	May Offer				
1144	Spreadsheet of Attorney's Fees from Sunstein Kann Murphy & Timbers LLP (IngenicoInc_0306636)	Def.	May Offer				
1145	Invoices from Sunstein Kann Murphy & Timbers LLP (IngenicoInc_0306637-0307553)	Def.	May Offer				
1146	Letter from Ingenico to BBPOS re REM Holdings (Jan. 19, 2017) (IngenicoInc_0142403)	Def.	Offer				
1147	Letter from Ingenico to BBPOS re REM Holdings (Feb. 28, 2017) (IngenicoInc_0142404)	Def.	Offer				
1148	Letter from Ingenico to BBPOS re IOENGINE (May 7, 2018) (IngenicoInc_0142413)	Def.	Offer				

1149	Letter from Ingenico to BBPOS re IOENGINE (Oct. 23 , 2018) (IngenicoInc_0142514)	Def.	Offer				
1150	Letter from Ingenico to BBPOS re MobilePay (Oct. 4 , 2018) (IngenicoInc_0142515)	Def.	Offer				
1151	Letter from Ingenico to BBPOS re Blackbird Technologies (Oct. 22, 2018) (IngenicoInc_0142405-12)	Def.	Offer				
1152	Letter from Ingenico to BBPOS re REM Holdings (Oct. 26, 2017) (IngenicoInc_0142516-27)	Def.	Offer				
1153	BBPOS, Letter from Robert Cook to Christopher Rotsaert and Sandeep Gaur, 5/21/2018 (BBPOS_0002780)	Def.	May Offer				
1154	Email Correspondence between Ken Paull and Ben lo, Subject: Jan. 6, Shipping Document (This doc was not bates numbered but used as Ex. 73 in Ben Lo's 30(b)(6) deposition)	Def.	Offer				
1155	Email Correspondence between Jose Luis, Oscar Bello and David Szczepanski, Subject: First Data Rapid Connect EMV Certifications (IngenicoInc_0307554-55)	Def.	May Offer				

1156	Email Correspondence between Ben Lo, Daniel Tsai and Jimmy Tang, Subject: Fwd: Ingenico-ROAM next Steps (BBPOS_0646802-04)	Def.	May offer				
1157	Email Correspondence between Jimmy Tang and Jerome Grandemenge, Subject: iWL- android with Roam Data Solution (BBPOS_0004422-23)	Def.	May offer				
1158	Email Correspondence between Christopher Rotsaert and Jerome Grandemenge, Subject: iWL – android with Roam Data solution (BBPOS_0004617-21)	Def.	Offer				
1159	Email Correspondence between Jimmy Tang and Christopher Rotsaert, Subject: Re: iWL – android with Roam Data solution, (BBPOS_0004622_48)	Def.	Offer				
1160	Email Correspondence between Ben Lo and Christopher Rotsaert; Subject: Data rate by audio jack (IngenicoInc_0009756-57)	Def.	May offer				
1161	Email Correspondence between Jimmy Tang and Eran Hollander; Subject: Re: Updated Invitation: Review API 4.0 part I requirements @ Tue. May 1 10pm-11:30pm (BBPOS_0004723_57)	Def.	May offer				

1162	Email Correspondence between Christopher Rotsaert and Ben Lo; Subject: RE: Workshop Swipe & Chip EMV L2 in Ingenico Valence (BBPOS_0000003-5)	Def.	Offer				
1163	Email Correspondence between Daniel Tsai and Christopher Rotsaert; Subject: Our confcall next Monday (BBPOS-0005186-88)	Def.	May offer				
1164	Email Correspondence from Daniel Tsai to Christopher Rotsaert, Subject: Our confcall next Monday (BBPOS_005193-357)	Def.	May offer				
1165	Email Correspondence between Jean-Louis Sarradin to Christopher Rotsaert, Subject: Visit BBPOS (IngenicoInc_0283863-64)	Def.	May offer				
1166	Email Correspondence between heq@landicorp.com to Christopher Rotsaert and Jerome Grandemenge, Subject: Weekly RP350x/RP750x— Meeting Minutes (IngenicoInc_0157061-63)	Def.	May offer				
1167	Email Correspondence between Ben Lo and Will Graylin, Subject: Re: Let's figure a win win plan going forward (BBPOS_065031-33)	Def.	Offer				

1168	Email Correspondence between David Baltozer and Jimmy Tang, Subject: Testing iOS using your RoamPayApi40Client code... (BBPOS_0655319-20)	Def.	May Offer				
1169	Email Correspondence between Ben Lo and Christopher Rotsaert, Subject: Re: Swiper Track 2 + Track 3 (BBPOS_0005121-22)	Def.	May offer				
1170	Email Correspondence between Jimmy Tang and Keith Bennett, Subject: Re: GPS Gateway version 7 (BBPOS_0598751)	Def.	May offer				
1171	Email Correspondence between Jimmy Tang and Will Graylin, Subject: Re: FW: Revised RD-106 (BBPOS_0642384-85)	Def.	May offer				
1172	Email Correspondence between Will Graylin and Ben Lo, Subject: Re: ROAM BBPOS deal confidential (BBPOS_1632203-08)	Def.	May offer				
1173	Email Correspondence between Ben Lo and Jimmy Tang, Subject: Fwd: FW: BBPOS Term Sheet (Asset Acquisition) and Shareholder Consent (BBPOS_0633723-24)	Def.	May offer				

1174	Email Correspondence between Ben Lo and Will Graylin, Subject: Fwd: FW: BBPOS Term Sheet (Asset Acquisition) and Shareholder Consent (BBPOS_0650487-90)	Def.	May offer				
1175	Email Correspondence between Will Graylin and Ben Lo, Subject: Re: Let's figure a win win plan going forward (BBPOS_0650544-49)	Def.	May offer				
1176	Email Correspondence between Ed Rubin and Ben Lo, Subject: Re: Nice to talk to you (AC_0155916)	Def.	May offer				
1177	Email Correspondence between Michael Kron, Mitchell Cobrin, and Mark Diamond, Subject: Fw: Fwd: connecting in HK (AC_0270837-38)	Def.	May offer				
1178	Email Correspondence between Ben Lo and Mitchell Cobrin, Subject: Re: Roam Data (AC_0096295-96)	Def.	Offer				
1179	Email Correspondence between Ben Lo to Daniel Tsai, Subject: re: ROAM visit (BBPOS_0658887)	Def.	Offer				
1180	Email Correspondence between Mark Diamond to Michael Kron, Subject: Re: market recon, erosion of accounts to Roam (AC_0222782-83)	Def.	May offer				

1181	Email Correspondence between Jimmy Tang and Christopher Rotsaert, Subject: Re: <ok (BBPOS_0005630-45)	Def.	May offer				
1182	Email Correspondence between Daniel Tsai and Christopher Rotsaert, Subject: The documents you requested (BBPOS_0005630-45)	Def.	May offer				
1183	Email Correspondence between Daniel Tsai and Christopher Rotsaert, Subject: Fwd: Paypal G4X – schematic (BBPOS_0005664-67)	Def.	May offer				
1184	Email Correspondence between David Szczepanski, Bob Cook, and Ben Lo, Subject: URGENT (BBPOS_0000057-58)	Def.	Offer				
1185	Email Correspondence between Matthew Ng, Bob Book, and Ben Lo , Subject: URGENT (BBPOS_0000070-73)	Def.	Offer				
1186	Email Correspondence between David Szczepanski, Book Cook, and Ben Lo, Subject: URGENT (BBPOS_0000076-78)	Def.	Offer				
1187	Email Correspondence between Bob Cook, Alex Choi, and Matthew Ng, subject: URGENT (BBPOS_0003629-32)	Def.	Offer				

1188	Email Correspondence between Alex Choi, David Szczepanski, Bob Cook, and Ben Lo, Subject: URGENT (BBPOS_0003656-61)	Def.	Offer				
1189	Email Correspondence between Ben Lo and Christopher Rotsaert, Subject: Workshop Swipe & Chip EMV L2 in Ingenico Valence (BBPOS_000001-2)	Def.	Offer				
1190	Email Correspondence Between Christopher Rotsaert and Ben Lo, Subject; Meeting Roam API in Ingenico – BBPOS (BBPOS_0004655-57)	Def.	Offer				
1191	Email Correspondence between Ben Lo and Christopher Rotsaert, Subject: Cartes Asia (BBPOS_0005175-79)	Def.	Offer				
1192	Email Correspondence between Christopher Rotsaert and Jimmy Tang, Subject: TR: RoamData/ Google/ DUKPT (BBPOS_0004379-81)	Def.	May Offer				
1193	Email Correspondence between Michael Kron and Ben Lo, Subject: Agreement with Roam (AC_0270579-80)	Def.	May Offer				
1194	Email Correspondence between Mitchell Cobrin, Michael Kron, and Mark Diamond, Subject: Best day of trip	Def.	May Offer				

	(AC_0218274-77)						
1195	Email Correspondence between Ben Lo, Mitchell Cobrin, and Michael Kron, Subject: Roam Data (AC_0096295-96)	Def.	Offer				
1196	Email Correspondence between Mark Diamond and Michael Kron, Subject: Market recon, erosion of accounts to Roam (AC_0222782-83)	Def.	May Offer				
1197	Email Correspondence between Michael Kron, Mitchell Cobrin, and Mark Diamond, Subject: In air (AC_0095962-65)	Def.	May Offer				
1198	Email Correspondence between Micharl Kron, Antoine Hage, and Mitchell Cobrin, Subject: Some facts (AC_0272263)	Def.	May Offer				
1199	Email correspondence between Jimmy Tang, Keith Bennett, and Bill Kincaid, Subject: GPS Gateway version 7 (BBPOS_0598751)	Def.	May Offer				
1200	Email Correspondence between Mark Diamond, Mitchell Cobrin, and Michael Kron, Subject: Call with Ed (AC_0219449)	Def.	May Offer				
1201	Email Correspondence between William Graylin, Ben Lo, and	Def.	Offer				

	Jimmy Tang, Subject: Please read carefully, Important (BBPOS_0659807-14)						
1202	Email Correspondence between Ben Lo, William Graylin, and Jimmy Tang Subject: Lets figure a win plan going forward (BBPOS_0650506-07)	Def.	Offer				
1203	Email Correspondence between Ben Lo, William Graylin, and Jimmy Tang, Subject: Lets figure out a win plan going forward (BBPOS_0650531-33)	Def.	May Offer				
1204	Email Correspondence between William Graylin, Ben Lo, and Jimmy Tang, Subject: Lets figure a win plan going forward (BBPOS_0650544-66)	Def.	May Offer				
1205	Email Correspondence between Daniel Tsai, Christopher Rotsaert, Derek Chan, and Ben Lo Subject: Our confcall next Monday w/attachments for the schematic diagram and datasheets of the M0 MCU, EMV controller IC and M4 MCU (BBPOS_005193-57)	Def.	May Offer				
1206	Email Correspondence between William Graylin, John Rodley, John Frontz, and Michael Armer, Subject: Hi (IngenicoInc_0020386- 92)	Def.	May Offer				

1207	Email Correspondence between Christopher Dismukes and Bart Wardzinski Subject: ROAM MSR Readers (IngenicoInc_0250852-56)	Def.	Offer				
1208	Email Correspondence between Christopher Dismukes, Bart Wardzinski and Scott Webb, Subject: ROAM MSR Readers (IngenicoInc_0250845-50)	Def.	Offer				
1209	Email Correspondence between Christopher Dismukes, Bart Wardzinski and Scott Webb, Subject: ROAM MSR Readers (IngenicoInc_0250862-67)	Def.	Offer				
1210	Email Correspondence between William Graylin, Ben Lo, and Christopher Rotsaert Subject: TR: BBPOS/ Due Diligence/ Updated URL (IngenicoInc_0032303-06)	Def.	May Offer				
1211	Email Correspondence between William Graylin, Ben Lo, Florian Sailer, Jean-Marc Thienpont, John Chu, and John Frontz Subject: Due Diligence Information Request (IngenicoInc_0031851-53)	Def.	May Offer				

1212	Due Diligence Information Report Request List attached to IngenicoInc_0031851-53 (ING021293)	Def	May Offer				
1213	Email Correspondence between Christopher Rotsaert, David Perlow, and Philippe Heuland, Subject: Demos (IngenicoInc_0307556)	Def.	May Offer				
1214	Email Correspondence between Bill Pittman, Christopher Rotsart, and Eran Hollander, Subject: NRF Show – Product Demos (IngenicoInc_0307557-61)	Def.	May Offer				
1215	Email Correspondence between Sriram Seetharam, Andrew Jamieson, Christopher Rotsaert, and Nick Penno, Subject: Roam Data/ UL Introduction – G4x (IngenicoInc_0307562-76)	Def.	May Offer				
1216	Email Correspondence between Sriram Seetharam, Andrew Jamieson, Christopher Rotsaert, and Nick Penno, Subject: Roam Data/ UL Introduction – G4x (IngenicoInc_0307577-84)	Def.	May Offer				
1217	Visa Ready Evaluation Report of Roam Data G4X IngenicoInc_0307595-608)	Def.	May Offer				

1218	Email Correspondence between Jean-Louis and Christopher Rotsaert, Subject: BBPOS Visit (IngenicoInc_0283863-64)	Def.	Offer				
1219	Text message exchange between Michael Kron and Ben Lo (AC_0014619-21)	Def.	Offer				
1220	Text message exchange between Michael Kron and Ben Lo (AC_0034161-69)	Def.	Offer				

INGENICO INC., INGENICO CORP. AND
INGENICO GROUP, SA,

By their attorneys,

/s/ Jeffrey K. Techentin

JOHN A. TARANTINO (BBO #492230)

PATRICIA K. ROCHA (BBO #542348)

NICOLE J. BENJAMIN (BBO #666959)

JEFFREY K. TECHENTIN (*pro hac vice*)

Adler Pollock & Sheehan P.C.

One Citizens Plaza, 8th Floor

Providence, RI 02903

Tel: (401) 274-7200

Fax: (401) 351-4607

jtarantino@apslaw.com

procha@apslaw.com

nbenjamin@apslaw.com

jtechentin@apslaw.com

Dated: April __, 2022

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2023, I caused to be served via electronic mail a true copy of
the within document on the following counsel of record:

Jonathon D. Friedmann, Esq.
Robert P. Rudolph, Esq.
Rudolph Friedmann LLP
92 State Street
Boston, MA 02109
JFriedmann@rflawyers.com
RRudolph@rflawyers.com

Oliver D. Griffin, Esq.
Peter N. Kessler, Esq.
Melissa A. Bozeman, Esq.
Kutak Rock LLP
303 Peach Street, N.E., Suite 2750
Atlanta, GA 30308
Oliver.griffin@kutakrock.com
Peter.kessler@kutakrock.com
Melissa.bozeman@kutakrock.com

Ricardo G. Cedillo, Esq.
755 E. Mulberry Ave., Ste 500
San Antonio, Texas 78212
rcedillo@lawdcm.com

/s/ Jeffrey K. Techentin

Jeffrey K. Techentin